

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

LYNNE CALLIGARO,

Plaintiff,

v.

DELOITTE CONSULTING LLP,

Defendant.

Civil Action No. 1:19-cv-1456-RDA-JFA

CONSENT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), Plaintiff Lynne Calligaro, and Defendant Deloitte Consulting LLP (together, the “Parties”), by and through their counsel, jointly move for entry of the attached proposed Stipulated Protective Order. As set forth therein, good cause exists for the entry of the Stipulated Protective Order as discovery in this action is expected to seek and require production of confidential information, disclosure of which may subject a party or person to “annoyance, embarrassment, oppression, or undue burden or expense.” Fed. R. Civ. P. 26(c); *see also Graves v. Indus. Power Generating Corp.*, No. 3:09-CV-717, 2010 WL 2943079, at *5 (E.D. Va. July 20, 2010) (good cause exists for entry of protective order governing non-party employee personnel information). The Parties do not seek oral argument on this motion.

Dated: June 17, 2020

Respectfully submitted,

/s/ Phillis h. Rambsy

Phillis h. Rambsy (VA Bar #92023)
prambsy@spigglelaw.com
THE SPIGGLE LAW FIRM, PC
4830 A 31st Street, South
Arlington, Virginia 22206
Telephone: (202) 499-8527
Fax: (202) 540-8018

Attorney for Plaintiff Lynne Calligaro

/s/ Allison S. Papadopoulos

Allison S. Papadopoulos (VA Bar No. 85715)
apapadopoulos@akingump.com
Esther G. Lander (admitted *pro hac vice*)
elande@akingump.com
AKIN GUMP STRAUSS HAUER & FELD LLP
2001 K Street N.W.
Washington, D.C. 20006
Telephone: (202) 887-4000
Fax: (202) 887-4288

Attorneys for Defendant Deloitte Consulting LLP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 17, 2020, I electronically filed this document through the ECF system, which will send a notice of electronic filing to all counsel of record.

/s/
Allison S. Papadopoulos (VA Bar No. 85715)
AKIN GUMP STRAUSS HAUER & FELD LLP
2001 K Street N.W.
Washington, D.C. 20006
Tel.: (202) 887-4000
Fax: (202) 887-4288
apapadopoulos@akingump.com
Attorney for Defendant Deloitte Consulting LLP